

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:
Civil File No. 18-296 (MJD/KMM)

**JOINT MOTION REQUESTING MODIFICATION OF THE PARTIES’
DEADLINE TO FILE JOINT MOTION REGARDING CONTINUED SEALING**

The parties in the above-captioned matter hereby jointly request the following modification of the parties’ deadline under Local Rule 5.6(d)(2) to file a joint motion regarding the continued sealing of documents that were filed under temporary seal in connection with Defendants’ Motion for Protective Order Regarding Plaintiffs’ Third-Party Subpoenas (the “Motion”).

WHEREAS:

Defendants filed various documents under temporary seal in connection with the Motion on July 16, 2020;

Plaintiffs filed various documents under temporary seal in connection with their Opposition to the Motion on July 23, 2020;

Defendants filed various documents under temporary seal in connection with their Reply on August 10, 2020;

Briefing on the Motion was completed with the filing of Defendants’ Reply on

August 10, 2020;

Local Rule 5.6(d)(2) directs the parties to file a joint motion regarding the continued sealing of documents within 21 days of the completion of briefing—in this case, August 31, 2020;

The parties have determined that they have differing positions on whether many of the documents filed under temporary seal should remain sealed;

The parties seek to meet and confer in order to discuss, and if possible, narrow their disagreement over whether the documents should remain sealed;

The parties believe it is in the best interests of the Court and the parties involved that the deadline for the parties' joint motion regarding continued sealing be modified, in order to permit the parties to discuss their positions;

THEREFORE:

1. The parties request a modification of the deadline to file their joint motion regarding continued sealing of documents filed temporarily under seal in connection with Defendants' Motion, such that the deadline is September 14, 2020.

Dated: August 31, 2020

Respectfully submitted,

/s/ William A. McNab

William A. McNab, MN Bar No. 320924

Thomas H. Boyd, MN Bar No. 0200517

WINTHROP & WEINSTINE, P.A.

Capella Tower, Suite 35002

225 South Sixth Street

Minneapolis, MN 55402

Telephone: (612) 604-6400

Facsimile: (612) 604-6800
wmcnab@winthrop.com
tboyd@winthrop.com

Patrick E. Gibbs, CA Bar No. 183174

COOLEY LLP

3175 Hanover Street
Palo Alto, CA 94304
Telephone: (650) 843-5535
Facsimile: (650) 618-0387
pgibbs@cooley.com

Sarah M. Lightdale, NYS Bar No. 4395661

COOLEY LLP

55 Hudson Yards
New York, NY 10001
Telephone: (212) 479-6374
Facsimile: (212) 479-6275
slightdale@cooley.com

Douglas P. Lobel, VA Bar No. 42329

David A. Vogel, VA Bar No. 48971

Dana A. Moss, VA Bar No. 80095

COOLEY LLP

One Freedom Square / Reston Town Center
11951 Freedom Drive
Reston, Virginia 20190-5656
Telephone: (703) 456-8000
Facsimile: (703) 456-8100
dlobel@cooley.com
dvogel@cooley.com
dmoss@cooley.com

Ryan Blair

COOLEY LLP

4401 Eastgate Mall
San Diego, CA 92121
Telephone: (858) 550-6047
Facsimile: (858) 527-2750
rblair@cooley.com

Jerry W. Blackwell (MN Bar No. 186867)

BLACKWELL BURKE P.A.

431 South 7th Street, Suite 25003
Minneapolis, MN 55415
Tel: (612) 343-3200
Fax: (612) 343-3205
blackwell@blackwellburke.com

Counsel for Defendants

/s/ Keil M. Mueller

Keith S. Dubanevich, OSB No. 975200
Timothy S. DeJong, OSB No. 940662
Keil M. Mueller, OSB No. 085535
Lydia Anderson-Dana, OSB No. 166167
**STOLL STOLL BERNE LOKTING &
SHLACHTER P.C.**
209 SW Oak Street, Suite 500
Portland, OR 97204
Telephone: (503) 227-1600
Facsimile: (503) 227-6840
kdubanevich@stollberne.com
tdejong@stollberne.com
kmueller@stollberne.com
landersondana@stollberne.com

John C. Browne, NYS Bar No. 3922747
Michael D. Blatchley, NYS Bar No. 4747424
Michael Mathai, NYS Bar No. 5166319
**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**
1251 Avenue of the Americas
New York, New York 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444
johnb@blbglaw.com
michaelb@blbglaw.com
michael.mathai@blbglaw.com

Richard D. Gluck, Cal. Bar. No. 151675
**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**
2121 Avenue of the Stars, Suite 2575
Los Angeles, CA 90067
Telephone: (310) 819-3470

Facsimile: (212) 554-1444
Rich.Gluck@blbglaw.com

*Special Assistant Attorneys General and
Counsel for Lead Plaintiff the State of Oregon
by and through the Oregon State Treasurer and
the Oregon Public Employee Retirement Board,
on behalf of the Oregon Public Employee
Retirement Fund, and Lead Counsel for the
Class and Plaintiff Fernando Vildosola, as
trustee for the AUFV Trust U/A/D 02/19/2009*

Richard A. Lockridge, MN No. 64117
Gregg M. Fishbein, MN No. 202009
Kate M. Baxter-Kauf, MN No. 392037
LOCKRIDGE GRINDAL NAUEN P.L.L.P.
100 Washington Avenue S, Suite 2200
Minneapolis, MN 55401
Telephone: (612) 596-4044
Facsimile: (612) 339-0981
ralockridge@locklaw.com
gmfishbein@locklaw.com
kmbaxter-kauf@locklaw.com

*Liaison Counsel for Lead Plaintiff the State of
Oregon by and through the Oregon State
Treasurer and the Oregon Public Employee
Retirement Board, on behalf of the Oregon
Public Employee Retirement Fund, and Plaintiff
Fernando Vildosola, as trustee for the AUFV
Trust U/A/D 02/19/2009*

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